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September 15, 2010

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: TV White Spaces
ET Docket Nos. 04-186 and 02-380

Dear Ms. Dortch:

Communication Specialists Company of Wilmington, LLC, whose Internet service is branded as Comspeco.net, provides fixed wireless broadband service to southeastern North Carolina, including Onslow, Pender, New Hanover and Brunswick Counties. We rely completely on unlicensed spectrum to deliver broadband services to consumers that have few options for high-speed Internet. We have deployed our network solely using devices authorized under Part 15 rules the FCC adopted to open up 900 MHz, 2.4 GHz and 5 GHz spectrum for unlicensed broadband devices.

The Commission's past initiatives have enabled Communication Specialists (Comspeco.net) to bring high-speed Internet (up to 10 mbps) to communities as far north as Holly Ridge and North Topsail to Leland and to underserved areas like Navassa in Brunswick County. We provide a valuable pay-as-you-go Internet service to ship-bound merchant sailors whose cargo ships sail in from all across the world to dock here at the North Carolina State Port.

Comspeco.net is very interested in utilizing television white spaces so that we can improve our coverage and quality of service. We have had numerous requests to provide Internet services in Bladen, Columbus, and other primarily rural counties, but have been unable to do so cost-effectively due to dense tree coverage and large distances between these lower-income communities. As soon as equipment for point-to-multipoint service is commercially available, we are firmly committed to investing in this technology to expand our services to those communities whom we have not been able to serve, but who have been requesting our services for nearly two years.

As the FCC begins considering and acting upon TV white space petitions, please note particularly the following proposals that will allow my WISP to bring high-speed Internet to a greater number of people:

(1) The FCC should allow WISPs to operate using base station antennas mounted higher than 30 meters, and we should be allowed to install customer antennas (CPE) at heights below 10 meters. If we could increase our base station antenna height to 100 meters, we could cover three times more area with a base station and reduce our equipment, tower acquisition and tower lease fees by a large amount – an amount that could be the difference between deploying and not deploying in an area. We support the WISPA and Motorola proposals to increase base station height. By removing any minimum CPE height restrictions, we would not have to put tall masts on residences and we would be able to provide service at a lower cost.

(2) We believe we should be allowed to operate with power in excess of 4 Watts EIRP in rural areas. As is the case with tower height, operating with higher power will give us a greater coverage area and we will not need to spend as much money on infrastructure.

(3) We are very concerned about a proposal made by FiberTower and others to license white space spectrum for point-to-point wireless backhaul. Not only would adopting this proposal take six channels (36 MHz) and perhaps more channels away from us, but WISPs also would have to protect these licensed links. Moreover, channels and areas far beyond the links would be blocked because the signals from the licensed links would overshoot the path and the endpoints. This is due to the low-cost, low-gain antennas FiberTower wants to use. We also would not deploy if a licensed point-to-point user could come along later and put us out of business with a licensed link. We support the views expressed by WISPA in their September 8 letter and ask the FCC to reject the FiberTower proposal.

Ms. Dortch, I am aware that your time, and the time of your colleagues, is valuable and I appreciate your consideration in this matter. It is very difficult for my company to stand by and have to decline to provide broadband services from requesting volunteer fire departments, schools, rural communities and others beyond the reach of our existing infrastructure. Please consider the value that WISPs like ours can bring to broadband industry and rule in our favor when finalizing your rules.

Sincerely,

Kelley McNeill
VP, Internet Services
Communication Specialists